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8 Laurie J. Bartilson SBN 139220  
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10 (213) 465-4395  
TELEFAX: (213) 953-3351  
11

12 Attorneys for Plaintiff  
CHURCH OF SCIENTOLOGY INTERNATIONAL  
13

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 FOR THE COUNTY OF MARIN

16 CHURCH OF SCIENTOLOGY	)	CASE NO. 157 680
INTERNATIONAL, a California not-	)	
17 for-profit religious corporation;	)	DECLARATION OF LAURIE J.
	)	BARTILSON IN SUPPORT OF
18 Plaintiff,	)	PLAINTIFF'S NOTICE OF
	)	MOTION AND MOTION FOR LEAVE
19 vs.	)	TO COMPLETE DISCOVERY;
	)	REQUEST FOR SANCTIONS FROM
20 GERALD ARMSTRONG; MICHAEL WALTON;	)	MICHAEL AND SOLINA WALTON
THE GERALD ARMSTRONG CORPORATION,	)	
21 a California for-profit	)	DATE: December 16, 1994
corporation; Does 1 through 100,	)	TIME: 9:00 a.m.
22 inclusive,	)	DEPT: 1
	)	
23 Defendants.	)	
	)	TRIAL DATE: May 18, 1995

24  
25 LAURIE J. BARTILSON deposes and says:

26 1. My name is Laurie J. Bartilson. I am an attorney  
27 licensed to practice in the State of California, and I am one of  
28

RECEIVED  
NOV 28 1994  
HUB LAW OFFICES

1 the attorneys responsible for the representation of the plaintiff  
2 in this action, Church of Scientology International ("the  
3 Church"). I am also one of the attorneys responsible for the  
4 representation of the Church in the earlier action between these  
5 parties, former LASC No. 052395, which has now been consolidated  
6 into this action. I have personal knowledge of the facts set  
7 forth in this declaration and could competently testify thereto  
8 if called as a witness.

9 2. There is still a substantial amount of discovery to be  
10 completed in regards to matters raised in the Second Amended  
11 Complaint in the former Los Angeles action ("the Breach case").  
12 When the Breach case was transferred from Los Angeles to Marin,  
13 plaintiff and defendants Gerald Armstrong and Gerald Armstrong  
14 corporation stipulated that this discovery is to be completed  
15 prior to the new trial date set for these now-consolidated cases.  
16 A true and correct copy of that stipulation is attached hereto as  
17 Exhibit A.

18 3. My co-counsel and I have worked diligently on behalf of  
19 our client to try to complete discovery in the Breach case, with  
20 only minimal success, because Mr. Greene, Armstrong's lawyer, has  
21 requested numerous continuances. Examples of letters from Mr.  
22 Greene requesting continuances or delays in discovery are  
23 attached hereto as Exhibit B. Nonetheless, the discovery is  
24 proceeding concerning the Breach case.

25 4. Due to his claimed unavailability, defendant  
26 Armstrong's deposition was not completed until October 20, 1994,  
27 and, because he refused to answer many questions, the Church must  
28 now bring a motion to compel further answers. At the same time,

1 in deposition Armstrong identified additional breaches of the  
2 contract, and additional witnesses that plaintiff needs to  
3 depose.

4 5. Once the Breach case was ordered transferred, this  
5 Court vacated the trial date in this action, consolidated the  
6 cases, and set a new trial date of May 18, 1995. A true and  
7 correct copy of that order is attached hereto as Exhibit C.

8 6. After this Court vacated the trial date of September  
9 29, and reset it for May 18, 1994, the Church sent a demand for  
10 inspection of the Fawn drive property to defendants Michael and  
11 Solina Walton. True and correct copies of these inspection  
12 demands are attached hereto as Exhibits D and E.

13 7. Defendant Solina Walton did not respond at all to the  
14 inspection demand. Defendant Michael Walton objected to it. A  
15 true and correct copy of Michael Walton's objection is attached  
16 hereto as Exhibit F.

17 8. The Church noticed Solina Walton's deposition on  
18 October 4, 1994. The deposition was set to take place on  
19 November 15, 1994. A true and correct copy of the deposition  
20 notice is attached hereto as Exhibit G.

21 9. Neither Michael Walton nor Solina Walton objected to  
22 the notice of deposition of Solina Walton. Neither appeared on  
23 the appointed date.

24 10. On November 17, 1994, I sent a letter to Mr. Walton,  
25 offering to stipulate to an extension of the discovery cut-off so  
26 as to allow the limited discovery still needed by the Church, and  
27 to permit Ms. Walton to take the discovery which Mr. Walton  
28 claimed she needed. A true and correct copy of that letter is

1 attached hereto as Exhibit H. The letter was sent to Mr. Walton  
2 by telefax, and was sent by mail to both the office mailing  
3 address that he has given me, and the post office box which  
4 appeared on his most recent filings.

5 11. I received no response to my November 17 letter.  
6 Thereafter, I made several telephone calls to Mr. Walton's  
7 office. Each time, I reached an answering machine with a message  
8 recorded by Mr. Walton. I left messages for Mr. Walton, asking  
9 him to return my calls so that we could meet and confer  
10 concerning this dispute. Mr. Walton did not return any of these  
11 calls.

12 12. On November 22, 1994, I sent a second letter to Mr.  
13 Walton, reiterating the need for cooperation on discovery  
14 matters. A true and correct copy of that letter is attached  
15 hereto as Exhibit I. I sent this letter by telefax, and via U.S.  
16 mail to the same two addresses. After sending the letter, I  
17 again called Mr. Walton's office. Again, I reached only a  
18 machine. Again, I have received no response.

19 I declare under the penalty of perjury under the laws of the  
20 State of California that the foregoing is true and correct.

21 Executed this 23rd day of November, 1994, at Los Angeles,  
22 California.

23   
24 Laurie J. Bartilson



1 Michael Lee Hertzberg  
2 740 Broadway, 5th Floor,  
3 New York, New York 10003  
4 (212) 982-9870

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13 6255 Sunset Boulevard, Suite 2000  
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15 (213) 953-3360

16 Attorneys for Plaintiff and  
17 Cross-Defendant CHURCH OF SCIENTOLOGY  
18 INTERNATIONAL

19 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
20 FOR THE COUNTY OF LOS ANGELES

21 CHURCH OF SCIENTOLOGY )  
22 INTERNATIONAL, a California not- )  
23 for-profit religious corporation, )

24 Plaintiffs, )

25 vs. )

26 GERALD ARMSTRONG; THE GERALD )  
27 ARMSTRONG CORPORATION, a )  
28 California corporation; Does 1 - )  
29 25 INCLUSIVE, )

30 Defendants. )

31 AND RELATED CROSS-COMPLAINT. )  
32 )  
33 )  
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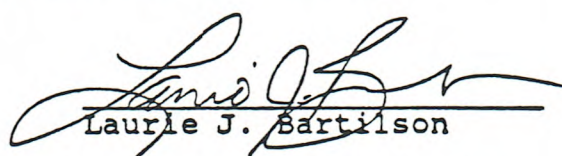
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LOS ANGELES  
SUPERIOR COURT

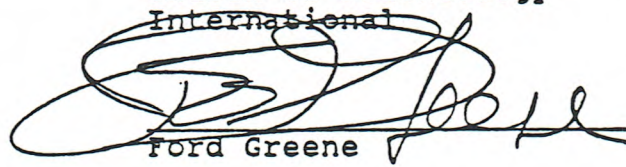
1 The parties agree that (1) the place of trial of this action  
2 be changed to the Superior Court of Marin County for the purpose  
3 of consolidation with the pending case of Church of Scientology  
4 International v. Gerald Armstrong, et al., Marin County Superior  
5 Court Case No. 157680; (2) payment of costs and fees of the  
6 transfer be made by plaintiff Church of Scientology  
7 International; (3) all orders previously entered in this action  
8 shall remain in full force and effect before, during and after  
9 the transfer and the Superior Court of Marin County shall be the  
10 proper Court for enforcement of those orders; and (4) discovery  
11 in the case shall continue while the transfer is pending.

12  
13 Dated: August 18, 1994

  
Laurie J. Bartilson

Attorney for Plaintiff  
Church of Scientology  
International

14  
15  
16  
17 Dated: August 18, 1994

  
Ford Greene

Attorney for Defendants  
Gerald Armstrong and the  
Gerald Armstrong  
Corporation

22 ORDER

23 The parties having agreed, and good cause appearing,  
24 IT IS ORDERED THAT:

- 25 1. Church of Scientology International v. Gerald  
26 Armstrong, et al., Case No. BC 052395, be transferred to the  
27 Superior Court of Marin County on payment by plaintiff, Church of  
28 Scientology International, of all fees required by law.







FORD GREENE  
LAWYER

HUB LAW OFFICES  
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SAN ANSELMO, CALIFORNIA 94960-1949  
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LICENSE No. 107601  
FACSIMILE (415) 456-5318

November 18, 1994

Laurie J. Bartilson  
BOWLES & MOXON  
6255 Sunset Boulevard, Suite 2000  
Los Angeles, CA 90028

By Telecopier  
213-953-3351

RE: *Scientology v. Armstrong*  
Marin County Superior Court  
Case No. 157 680

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Dear Laurie:

Yesterday my office received personal service of the motion for summary adjudication that you have set for December 23, 1994 at 9:00 a.m. As you know, I will be in trial all of that month. Thus, I am requesting your cooperation to reset the hearing so that I can have a reasonable opportunity to oppose the same. In addition, I want to take the deposition of Michael Flynn before the hearing because his testimony is central to the issue of whether or not my client consented to the signing of the settlement contract.

As to the deposition of Lawrence Wollersheim, I would like his deposition to proceed sometime after the first of the year (as you and I previously discussed) because I am unable to handle a trip to Colorado and being in trial at the same time. I have the same scheduling difficulties with respect to Ed Roberts and Denise Cantin and request the same consideration.

I look forward to hearing from you.

Sincerely,



FORD GREENE

:acg

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OF COUNSEL  
JEANNE M. GAVIGAN  
MARCELLO M. DI MAURO  
LESLIE T.W. SOASH

\* ALSO ADMITTED IN OREGON  
# ALSO ADMITTED IN THE DISTRICT OF COLUMBIA  
† ALSO ADMITTED IN MASSACHUSETTS  
‡ ALSO ADMITTED IN FLORIDA

November 9, 1994

BY TELEFAX AND U.S. MAIL

Ford Greene, Esq.  
Hub Law Offices  
711 Sir Francis Drake Blvd.  
San Anselmo, California 94960-1949

Re: Church of Scientology International v. Gerald Armstrong  
LASC BC 052395

Dear Ford:

Thank you for your letter of November 8 regarding the deposition of Larry Wollersheim in the above-entitled case. I hope that we will be able to reach an agreement concerning this deposition.

As you know, I have been leaving messages at your office for more than a week, but you have not returned my calls. With no return communication, it is impossible for me to be endlessly accommodating concerning your schedule.

Our agreement, memorialized by a letter dated September 30, 1994 was that "the plaintiff will not notice any additional depositions to be taken in this action until the trial in your case of Simon v. Chakpori Ling Foundation, Sonoma County Superior Court No. 175898 is concluded or the case settled, provided that the case does indeed commence trial proceedings as scheduled on October 28, 1994." You further agreed that you would "keep me apprised of developments in that case, and, specifically, to notify me immediately should (1) you agree to settle the case; (2) the trial concludes; or (3) the trial is postponed." The agreement certainly did not include the postponement of Mr. Wollersheim's deposition (or anyone's, for that matter) until 1995.

You did not keep me informed of the status of your trial. When I was unable to reach you last week, I contacted the Sonoma County clerk, and was informed that your trial had, indeed, been postponed for one month. Recognizing that you were thus available for November, but would become unavailable after November 28, I noticed Mr. Wollersheim's deposition for November 17.

Ford Greene  
November 9, 1994  
Page 2

Ford, you specifically requested that I limit the depositions in this case during October so that you could use the time to prepare for your trial, which was scheduled to start on October 28. There should be no need for you to demand that I similarly clear the rest of November. Had you informed me of the postponement in a timely fashion, I would have tried to schedule Wollersheim and the other depositions earlier in the month. Now, I am left with little choice but to place them either at the end of the month, or during your trial.

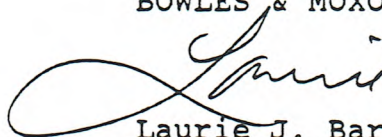
I am, however, willing to work with you to arrange a deposition of Mr. Wollersheim that will accommodate all of our needs. Will you produce Mr. Wollersheim by agreement, or must I serve him? What dates in November or December are available for you and for Mr. Wollersheim? Will Mr. Wollersheim agree to come to California if plaintiff agrees to pay for one half of his transportation? Please get back to me as soon as possible with answers to these questions.

In addition, I would also like to schedule the depositions of Ed Roberts and Denise Cantin as soon as possible. Please provide me with possible dates for these deponents as well.

Finally, there are outstanding requests for production of documents addressed to Mr. Armstrong and to the Gerald Armstrong Corporation. They were originally served on August 10, 1994, and, by agreement, you have had an extension of time in which to respond. Please be advised that plaintiff is not willing to extend indefinitely the time in which to respond, and requests that Armstrong and the Gerald Armstrong Corporation respond to the document requests by November 21, 1994.

Sincerely,

BOWLES & MOXON



Laurie J. Bartilson

LJB:aeu  
ENC.

cc: Andrew H. Wilson, Esq.  
Michael Lee Hertzberg, Esq.  
Paul Morantz, Esq.

FORD GREENE  
LAWYER

HUB LAW OFFICES  
711 SIR FRANCIS DRAKE BOULEVARD  
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November 8, 1994

Laurie J. Bartilson  
BOWLES & MOXON  
6255 Sunset Boulevard, Suite 2000  
Los Angeles, California 90028

By Telecopier  
213.953.3351

RE: *Church of Scientology International v. Armstrong*  
Los Angeles Superior Court  
Case No. BC 052 395

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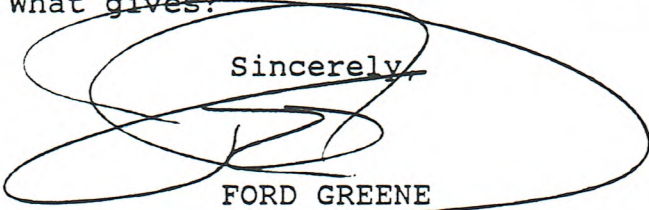
Dear Laurie:

Yesterday afternoon I received a message from you on my answering machine asking me to call you because there were some depositions that you wanted to set and you wanted to meet and confer with me regarding convenient dates. I returned your call, but was told that you had gone to the law library. Later in the afternoon, my office was personally served with a notice of deposition in Colorado for Lawrence Wollersheim for November 17th.

My trial in Simon starts on November 28th (Judge Watters having changed it). There is no way that I can or will go to Colorado on this short notice which violates the spirit, if not the letter, of our prior agreement that was designed not to have discovery in Armstrong interfere with my trial preparation in Simon. Furthermore, it is my understanding that Mr. Wollersheim is not available at any rate until after the 1st of the year which is the time period that you and I previously agreed would be when the Colorado depositions would proceed.

Please withdraw your notice for Mr. Wollersheim's deposition. Otherwise, I will have to seek a protective order and sanctions. This abrupt change in attitude is strange and disconcerting. What gives?

Sincerely,



FORD GREENE

:acg

cc: Andrew H. Wilson  
Michael L. Hertzberg  
Michael Walton

FORD GREENE  
LAWYER

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October 5, 1994

Laurie J. Bartilson  
BOWLES & MOXON  
6255 Sunset Boulevard, Suite 2000  
Los Angeles, California 90028

By Telecopier  
213.953.3351

RE: *Church of Scientology International v. Armstrong*  
Los Angeles Superior Court  
Case No. BC 052 395

---

Dear Laurie:

In response to your letter dated September 30, 1994, and further to our telephone conversation of October 3rd, I confirm the following:

1. Spanky Taylor's deposition commenced today at 10:00 a.m.
2. Vaughn Young's deposition will commence in Corona Del Mar on October 7, 1994 at 10:00 a.m.
3. Stacy Young's deposition will commence on October 18, 1994 at Andrew Wilson's office and each side will evenly split the costs of her round trip transportation from Seattle to San Francisco.
4. Gerald Armstrong's deposition shall commence on October 18th or 19th depending on the completion time of Stacy's deposition.
5. Jury selection in Simon will commence on October 28th with testimony anticipated to start on November 7th. No further depositions will be scheduled until trial is completed or the case is settled.

Sincerely,



FORD GREENE

:acg

cc: Vaughn Young  
Stacey Young

FORD GREENE  
LAWYER

HUB LAW OFFICES  
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September 28, 1994

Laurie J. Bartilson  
BOWLES & MOXON  
6255 Sunset Boulevard, Suite 2000  
Los Angeles, California 90028

By Telecopier  
213.993.4414

RE: *Church of Scientology International v. Armstrong*  
Los Angeles Superior Court  
Case No. BC 052 395

---

Dear Laurie:

This letter will confirm our telephone conversations of September 23, 1994 and September 26, 1994 regarding the scheduling of depositions in the above case.

On September 23 you advised me that your top priority was to finish the deposition of Gerald Armstrong and take and complete the depositions of Sylvia Taylor, Vaughn Young and Stacey Young. Ms. Taylor's deposition is set for 10:00 a.m. on October 5th and Vaughn Young's is set for 10:00 a.m. on October 7, 1994 at your offices in Los Angeles.

I advised you that I have a trial in Simon v. Chakpori Ling Foundation, Sonoma County Superior Court No. 175898 that will start on October 28, 1994 (the five-year statute is close to having expired) and that I did not want to get bogged down in a lot of Armstrong discovery during the time when I am preparing for trial. Thus, I wanted you to be prepared to commence Mr. Young's deposition on October 6th so that I would not waste a day sitting around in Los Angeles. I also told you that I would check with Mrs. Young regarding her deposition which must occur in the State of Washington. We both agreed to defer proceeding with the other depositions in Colorado and the United Kingdom until a later time.

On September 26, 1994, you and I spoke again on these matters and reiterated the above considerations. You advised me that you had to check with your client regarding changing Mr. Young's deposition to October 6th. I also asked you whether or not your client would be willing to pay one-half the cost to fly Mrs. Young to San Francisco, avoiding the requirement that we all have to travel to Seattle. You advised me that after checking with your clients, you would get back to me. Finally, we

Laurie J. Bartilson  
September 28, 1994  
Page 2.

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By Telecopier

discussed the completion of Gerald's deposition which you estimated would involve one more day. After reviewing what you wanted, I told you that I would be inclined to cooperate in proceeding with four days of depositions in October if I had your agreement in writing that no other depositions would be scheduled in Armstrong until the completion of my trial in Simon.

Sincerely,



FORD GREENE

:acg

cc: Andrew H. Wilson  
Toby Plevin (by fax)  
Vaughn Young (by fax)  
Paul Morantz (by fax)



**BOWLES & MOXON**  
ATTORNEYS AT LAW  
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KENDRICK L. MOXON #  
LAURIE J. BARTILSON †  
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OF COUNSEL  
JEANNE M. GAVIGAN  
MARCELLO M. DI MAURO  
LESLIE T.W. SOASH

\* ALSO ADMITTED IN OREGON  
# ALSO ADMITTED IN THE DISTRICT OF COLUMBIA  
† ALSO ADMITTED IN MASSACHUSETTS  
‡ ALSO ADMITTED IN FLORIDA

September 19, 1994

BY TELEFAX AND U.S. MAIL

Ford Greene, Esq.  
Hub Law Offices  
711 Sir Francis Drake Blvd.  
San Anselmo, California 94960-1949

Re: Church of Scientology International v. Gerald Armstrong  
LASC BC 052395

Dear Mr. Greene:

I would like to work with you to set some of the depositions which are still to be taken in the breach case. To that end, my co-counsel and I would like to suggest the following dates for some of the out of state depositions:

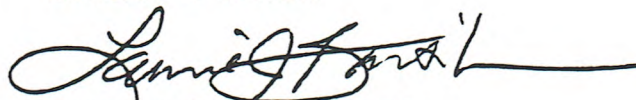
Bob Penny (Colorado)	October 19, 1994
Larry Wollersheim (Colorado)	October 20, 1994
Stacy Young (Washington)	October 25, 1994
Ron Lawley (U.K.)	November 7, 1994
Jon Atack (U.K.)	November 9, 1994
Denise Cantin (Massachusetts)	November 17, 1994

In addition, we propose that the deposition of Gerald Armstrong continue in San Francisco on October 27, 1994.

Please let me know as soon as possible if these dates are acceptable. As you know, with out of town depositions extra time is needed to contact local counsel, arrange for the issuance of the subpoenas, etc. Please also advise me if you intend to produce your client, Denise Cantin, pursuant to agreement, or if I will be required to compel her appearance by subpoena.

Sincerely,

BOWLES & MOXON



Laurie J. Bartilson

LJB:aeu

cc: Andrew H. Wilson, Esq.  
Michael Lee Hertzberg, Esq.  
Paul Morantz, Esq.

FORD GREENE  
LAWYER

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September 6, 1994

Laurie J. Bartilson  
BOWLES & MOXON  
6255 Sunset Boulevard, Suite 2000  
Los Angeles, California 90028

By Telecopier  
213.993.4414

RE: *Church of Scientology International v. Armstrong*  
Los Angeles Superior Court  
Case No. BC 052 395

---

Dear Laurie:

I apologize for the confusion that has taken place with respect to the deposition of Spanky Taylor. When I spoke to you approximately ten days ago, I advised you that I had a conflict in my schedule with respect to the September 7 date for Spanky's deposition, but in light of the fact that Graham Berry would represent her, I felt comfortable about not appearing at said deposition. My reasoning for this was based on Mr. Berry's familiarity with both this case and its issues in light of his personal participation in it. Apparently, Mr. Berry is forbidden from engaging in such representation, a fact which came to light today while I was out of the office all day at a hearing in another case.

With all that in mind, now that Mr. Berry can't represent Ms. Taylor, I do want to be present at the deposition and am unable to do so on such short notice. I am advised that Ms. Taylor has retained Toby Plevin to represent her at the deposition and assure you that I will work with both you and Ms. Plevin in order to reschedule the deposition in the near future. Again, I apologize for the inconvenience and assure you of my cooperation in rescheduling the matter.

Sincerely,



FORD GREENE

:acg  
cc: Andrew H. Wilson  
Toby Plevin (by fax)

FORD GREENE  
LAWYER

HUB LAW OFFICES  
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August 1, 1994

Laurie J. Bartilson  
BOWLES & MOXON  
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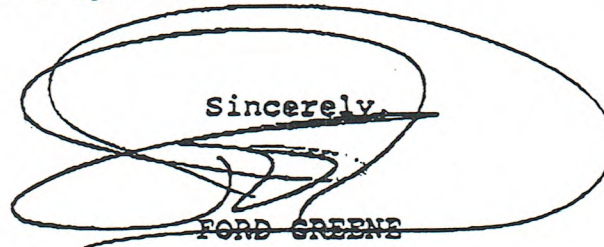
By Telecopier  
213.993.4414

RE: *Church of Scientology International v. Armstrong*  
Los Angeles Superior Court  
Case No. BC 052 395

---

Dear Ms. Bartilson:

My father died last night and I find myself in no condition to sustain focused thinking. Would you please consent to a continuance of the C.C.P. § 437c hearing set for tomorrow? Paul Morantz cannot do it because he does not know the cross-complaint component of the litigation.

Sincerely,  
  
FORD GREENE

:acg  
cc: Paul Morantz  
Andrew H. Wilson

FORD GREENE  
LAWYER

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July 18, 1994

Laurie J. Bartilson  
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6255 Sunset Boulevard, Suite 2000  
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By Telecopier  
213.953.3351

RE: *Church of Scientology International v. Armstrong*  
Los Angeles Superior Court  
Case No. BC 052 395

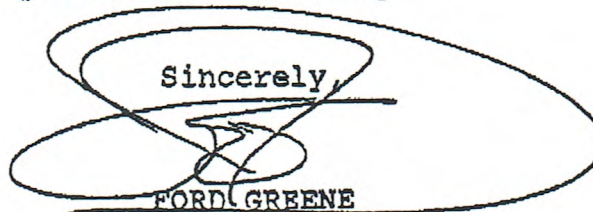
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Dear Ms. Bartilson:

This letter will confirm that in light of today's malfunction of the office's copy machine, you agree that Mr. Armstrong may file his opposition to the motion for summary judgment on July 20, 1994.

I will endeavor to fax the opposing papers to you by Noon that day.

If you disagree that this is our understanding, please advise me immediately thereof in writing.

Sincerely,  
  
FORD GREENE

:acg  
cc: Paul Morantz  
Andrew H. Wilson

**EXHIBIT C**

1 Andrew H. Wilson SBN 063209  
2 WILSON, RYAN CAMPILONGO  
3 235 Montgomery Street  
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12 (213) 463-4395  
13 TELEFAX: (213) 953-3351

14 Attorneys for Plaintiff  
15 CHURCH OF SCIENTOLOGY  
16 INTERNATIONAL

17 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
18 FOR THE COUNTY OF MARIN

19 CHURCH OF SCIENTOLOGY  
20 INTERNATIONAL, a California not-  
21 for-profit religious corporation,

22 Plaintiff,

23 vs.

24 GERALD ARMSTRONG; DOES 1 through  
25 25, inclusive,

26 Defendants.

27 ) CASE NO. 157 680  
28 )  
29 ) [PROPOSED] ORDER  
30 ) RE JOINT MOTION FOR  
31 ) CONSOLIDATION AND  
32 ) CONTINUANCE OF TRIAL DATE

33 ) TRIAL DATE: May 18, 1995

34 The joint motion of plaintiff Church of Scientology  
35 International ("Church") and defendants Gerald Armstrong and  
36 Gerald Armstrong Corporation for consolidation and continuance of  
37 trial date is GRANTED. The new trial date is May 18, 1995 at  
38 10:00 a.m. The old trial date of September 29, 1994, is vacated.

FILED

OCT 25 1994

HOWARD J. ...  
MARIN COUNTY CLERK  
P.Y: E. Kerwick Deputy

1 The new settlement conference date is May 8, 1995 at 9:00 a.m.  
2 The old settlement conference date of September 19, 1994 is  
3 vacated.

4 Dated: <sup>Oct</sup> ~~September 28~~, 1994

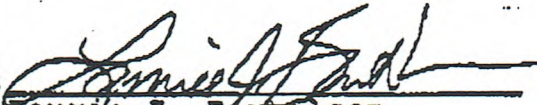
GARY W. THOMAS

GARY W. THOMAS  
Judge of the Superior Court

8 Submitted by: - - - - -

9  
10 Andrew H. Wilson  
WILSON, RYAN & CAMPILONGO

11 BOWLES & MOXON

12  
13 By:   
14 Laurie J. Bartilson

15 Attorneys for Plaintiff  
16 CHURCH OF SCIENTOLOGY  
INTERNATIONAL

17 APPROVED AS TO FORM:

18   
19 By: Ford Greene

20 Ford Greene, Esq.  
21 HUB LAW OFFICES  
22 Attorney for Defendants  
GERALD ARMSTRONG and THE GERALD  
ARMSTRONG CORPORATION

23  
24  
25 By: Michael Walton, Esq.  
26 Pro Se

28





1 Andrew H. Wilson  
WILSON, RYAN & CAMPILONGO  
2 235 Montgomery Street  
Suite 450  
3 San Francisco, California 94104  
(415) 391-3900

4 Laurie J. Bartilson  
5 BOWLES & MOXON  
6255 Sunset Boulevard  
6 Suite 2000  
Hollywood, California 90028  
7 (213) 463-4395

8 Attorneys for Plaintiff  
CHURCH OF SCIENTOLOGY INTERNATIONAL  
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF MARIN

12 CHURCH OF SCIENTOLOGY OF ) Case No. 157680  
INTERNATIONAL, a California not- )  
13 for-profit religious corporation; ) PLAINTIFF'S DEMAND FOR  
INSPECTION OF REAL PROPERTY  
14 Plaintiff, )  
)  
15 vs. )  
)  
16 GERALD ARMSTRONG; MICHAEL WALTON; )  
THE GERALD ARMSTRONG CORPORATION, )  
17 a California for-profit )  
corporation; DOES 1 through 100, )  
18 inclusive, )  
)  
19 Defendants. )  
)  
20

21 DEMANDING PARTY: Plaintiff Church of Scientology International

22 RESPONDING PARTY: Defendant Michael Walton

23 SET NO.: 2

24 Plaintiff Church of Scientology International ("plaintiff")  
25 demands, pursuant to C.C.P. § 2031, that, on November 1, 1994, at  
26 10:00 a.m., defendant Michael Walton permit plaintiff and/or  
27 someone acting on plaintiff's behalf to enter upon and inspect  
28 the property currently in the possession, custody and/or control

1 of defendant which is located at 707 Fawn Drive, San Anselmo,  
2 California, and more particularly described as follows:

3 PARCEL ONE

4 PARCEL TWO as shown upon that certain Parcel Map  
5 entitled, "Parcel Map Lands of California Land Title  
6 Portion Lands described in book 2887 of Official  
7 Records, at page 367, also being Portion of Lots 501  
8 and 501-A unrecorded Map of Sleepy Hollow Acres,  
9 Vicinity of San Anselmo, Marin County, California,  
10 filed for record April 8, 1976 in Volume 12 of Parcel  
11 Maps, at page 43, Marin County Records.

12 EXCEPTING THEREFROM that portion deeded to Alain Pigois  
13 and Nina Pigois, husband and wife, as community  
14 property, by Deed recorded February 27, 1989, Serial  
15 No. 89 13373.

16 PARCEL TWO

17 AN EASEMENT for ingress, egress and public utility  
18 purposes described as follows:

19 BEGINNING at a point on the centerline of Fawn Drive,  
20 said point being the most southwesterly corner of  
21 Parcel 3, as shown upon that certain map entitled,  
22 "Parcel Map Lands of California Land Title Portion  
23 Lands described in Book 2887 of Official Records, at  
24 page 367, also being a portion of Lots 501 and 501-A,  
25 unrecorded Map of Sleepy Hollow Acres, Vicinity of San  
26 Anselmo, Marin County, California", filed for record  
27 April 9, 1976 in Volume 12 of Parcel Maps, at page 43,  
28 Marin County Records, said point also being the  
intersection of the calls "South 26° 20' East 135 feet  
and North 63° 40' East 20 feet" as contained in Parcel  
2 of the Deed executed by California Land Title  
Company, a corporation to Michael C. McGuckin, et ux,  
recorded March 26, 1976 in Book 3010 of Official  
Records, at page 190, Marin County Records; thence from  
said point of beginning and along the exterior boundary  
of said Parcel 3, North 63° 40' East 20 feet; thence  
North 75° 07' 20" East 164.00 feet; thence leaving said  
exterior boundary of Parcel 3, North 12° 41' East 85.00  
feet; thence North 30° 45' West 126.00 feet, thence  
North 13° 30' East 79.21 feet to the northwesterly  
boundary of Parcel 1, as shown upon that certain map  
referred to hereinabove; thence along the exterior  
boundary of said Parcel 1, South 84° 00' west 75.70  
feet to the most Northerly corner of the parcel of land  
described in the Deed executed by Charles B. Robertson,  
et ux, to Paul Hopkins Talbot, Jr., et ux, recorded  
January 30, 1956 in book 1002 of Official Records, at  
page 623, Marin County Records; thence 111.77 feet,

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thence leaving said exterior boundary of Parcel 1,  
South 18° 45' East 95.06 feet thence South 21° 48' West  
70.66 feet; thence South 75° 07' 20" West 160.00 feet  
to the certline of Fawn Drive; thence along the  
exterior boundary of said Parcel 3, also being the  
centerline of "Fawn Drive, South 26° 20' East 34.46  
feet to the point of beginning.

Dated: September 27, 1993

BOWLES & MOXON

By:   
Laurie J. Bartilson

Andrew H. Wilson  
WILSON, RYAN & CAMPILONGO

Attorneys for Plaintiff  
Church of Scientology  
International

PROOF OF SERVICE

STATE OF CALIFORNIA            )  
  )    ss.  
COUNTY OF LOS ANGELES        )

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On September 27, 1994, I served the foregoing document described as PLAINTIFF'S DEMAND FOR INSPECTION OF REAL PROPERTY on interested parties in this action,

by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

by placing  the original  true copies thereof in sealed envelopes addressed as follows:

FORD GREENE  
HUB Law Offices  
711 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

MICHAEL WALTON  
700 Larkspur Landing Circle  
Suite 120  
Larkspur, CA 94939

SOLINA WALTON  
707 Fawn Drive  
San Anselmo, CA 94960-1160

BY MAIL

\*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on September 27, 1994, at Los Angeles, California.

**\*\* (BY PERSONAL SERVICE)** I delivered such envelopes by hand to the offices of the addressees.

**\*\*** Such envelopes were hand delivered by Messenger Service

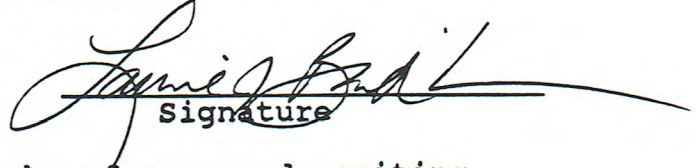
Executed on \_\_\_\_\_, at Los Angeles, California.

(State) I declare under penalty of the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Laurie Barzilson

Print or Type Name

  
Signature

\* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

\*\* (For personal service signature must be that of messenger)



1 Andrew H. Wilson  
WILSON, RYAN & CAMPILONGO  
2 235 Montgomery Street  
Suite 450  
3 San Francisco, California 94104  
(415) 391-3900

4 Laurie J. Bartilson  
5 BOWLES & MOXON  
6255 Sunset Boulevard  
6 Suite 2000  
Hollywood, California 90028  
7 (213) 463-4395

8 Attorneys for Plaintiff  
CHURCH OF SCIENTOLOGY INTERNATIONAL  
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF MARIN

12 CHURCH OF SCIENTOLOGY OF ) Case No. 157680  
INTERNATIONAL, a California not- )  
13 for-profit religious corporation; ) PLAINTIFF'S DEMAND FOR  
Plaintiff, ) INSPECTION OF REAL PROPERTY  
14 )  
15 vs. )  
16 GERALD ARMSTRONG; MICHAEL WALTON; )  
THE GERALD ARMSTRONG CORPORATION, )  
17 a California for-profit )  
corporation; DOES 1 through 100, )  
18 inclusive, )  
19 Defendants. )  
20

21 DEMANDING PARTY: Plaintiff Church of Scientology International

22 RESPONDING PARTY: Defendant Solina Walton

23 SET NO.: 1

24 Plaintiff Church of Scientology International ("plaintiff")  
25 demands, pursuant to C.C.P. § 2031, that, on November 1, 1994, at  
26 10:00 a.m., defendant Solina Walton permit plaintiff and/or  
27 someone acting on plaintiff's behalf to enter upon and inspect  
28 the property currently in the possession, custody and/or control

1 of defendant which is located at 707 Fawn Drive, San Anselmo,  
2 California, and more particularly described as follows:

3 PARCEL ONE

4 PARCEL TWO as shown upon that certain Parcel Map  
5 entitled, "Parcel Map Lands of California Land Title  
6 Portion Lands described in book 2887 of Official  
7 Records, at page 367, also being Portion of Lots 501  
8 and 501-A unrecorded Map of Sleepy Hollow Acres,  
9 Vicinity of San Anselmo, Marin County, California,  
10 filed for record April 8, 1976 in Volume 12 of Parcel  
11 Maps, at page 43, Marin County Records.

12 EXCEPTING THEREFROM that portion deeded to Alain Pigois  
13 and Nina Pigois, husband and wife, as community  
14 property, by Deed recorded February 27, 1989, Serial  
15 No. 89 13373.

16 PARCEL TWO

17 AN EASEMENT for ingress, egress and public utility  
18 purposes described as follows:

19 BEGINNING at a point on the centerline of Fawn Drive,  
20 said point being the most southwesterly corner of  
21 Parcel 3, as shown upon that certain map entitled,  
22 "Parcel Map Lands of California Land Title Portion  
23 Lands described in Book 2887 of Official Records, at  
24 page 367, also being a portion of Lots 501 and 501-A,  
25 unrecorded Map of Sleepy Hollow Acres, Vicinity of San  
26 Anselmo, Marin County, California", filed for record  
27 April 9, 1976 in Volume 12 of Parcel Maps, at page 43,  
28 Marin County Records, said point also being the  
intersection of the calls "South 26° 20' East 135 feet  
and North 63° 40' East 20 feet" as contained in Parcel  
2 of the Deed executed by California Land Title  
Company, a corporation to Michael C. McGuckin, et ux,  
recorded March 26, 1976 in Book 3010 of Official  
Records, at page 190, Marin County Records; thence from  
said point of beginning and along the exterior boundary  
of said Parcel 3, North 63° 40' East 20 feet; thence  
North 75° 07' 20" East 164.00 feet; thence leaving said  
exterior boundary of Parcel 3, North 12° 41' East 85.00  
feet; thence North 30° 45' West 126.00 feet, thence  
North 13° 30' East 79.21 feet to the northwesterly  
boundary of Parcel 1, as shown upon that certain map  
referred to hereinabove; thence along the exterior  
boundary of said Parcel 1, South 84° 00' west 75.70  
feet to the most Northerly corner of the parcel of land  
described in the Deed executed by Charles B. Robertson,  
et ux, to Paul Hopkins Talbot, Jr., et ux, recorded  
January 30, 1956 in book 1002 of Official Records, at  
page 623, Marin County Records; thence 111.77 feet,



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thence leaving said exterior boundary of Parcel 1, South 18° 45' East 95.06 feet thence South 21° 48' West 70.66 feet; thence South 75° 07' 20" West 160.00 feet to the certline of Fawn Drive; thence along the exterior boundary of said Parcel 3, also being the centerline of "Fawn Drive, South 26° 20' East 34.46 feet to the point of beginning.

Dated: September 27, 1993

BOWLES & MOXON

By:   
Laurie J. Bartilson

Andrew H. Wilson  
WILSON, RYAN & CAMPILONGO

Attorneys for Plaintiff  
Church of Scientology  
International

PROOF OF SERVICE

STATE OF CALIFORNIA            )  
                                  )  ss.  
COUNTY OF LOS ANGELES        )

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On September 27, 1994, I served the foregoing document described as PLAINTIFF'S DEMAND FOR INSPECTION OF REAL PROPERTY on interested parties in this action,

[ ] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [ ] the original [X] true copies thereof in sealed envelopes addressed as follows:

FORD GREENE  
HUB Law Offices  
711 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

MICHAEL WALTON  
700 Larkspur Landing Circle  
Suite 120  
Larkspur, CA 94939

SOLINA WALTON  
707 Fawn Drive  
San Anselmo, CA 94960-1160

[X] BY MAIL

[ ] \*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[X] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on September 27, 1994, at Los Angeles, California.

**\*\* (BY PERSONAL SERVICE)** I delivered such envelopes by hand to the offices of the addressees.

**\*\*** Such envelopes were hand delivered by Messenger Service

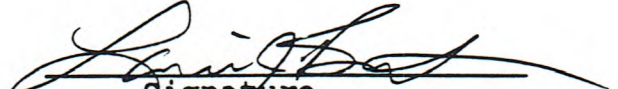
Executed on \_\_\_\_\_, at Los Angeles, California.

(State) I declare under penalty of the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Laurie Bodison

Print or Type Name

  
Signature

\* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

\*\* (For personal service signature must be that of messenger)



1 MICHAEL WALTON  
2 P.O. Box 751  
3 San Anselmo, CA 94979  
4 (415) 456-7920  
5 In Propria Persona

6 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
7 FOR THE COUNTY OF MARIN

8 CHURCH OF SCIENTOLOGY )  
9 INTERNATIONAL, a California )  
10 not-for-profit religious )  
11 corporation, ) CASE NO. 157 680  
12 )  
13 Plaintiff, )  
14 )  
15 vs. ) MICHAEL WALTON'S RESPONSE  
16 ) TO PLAINTIFF'S DEMAND FOR  
17 GERALD ARMSTRONG; MICHAEL ) INSPECTION OF REAL PROPERTY  
18 WALTON; THE GERALD ARMSTRONG )  
19 CORPORATION, a California for )  
20 profit corporation; DOES 1 ) Date:  
21 through 100, inclusive, ) Time:  
22 ) Location:  
23 Defendants. ) Trial Date: May 18, 1995  
24 \_\_\_\_\_ )

1 DEMANDING PARTY: Church of Scientology International, plaintiff.  
2 RESPONDING PARTY: Michael Walton, defendant.

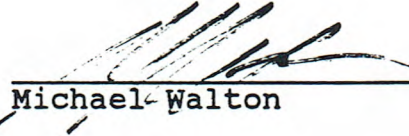
3 THIS RESPONSE is by MICHAEL WALTON to the PLAINTIFF'S DEMAND  
4 FOR INSPECTION OF REAL PROPERTY.

5 RESPONSE TO DEMAND

6 I object to this demand on the grounds that it violates my  
7 constitutional right of privacy; it is irrelevant, burdensome and  
8 oppressive, harassive and not calculated to lead to the discovery  
9 of admissible evidence. The attempted discovery also violates the

1 "30 day rule" and is, therefore, discovery prohibited by C.C.P  
2 Section 2024(a).

3 Dated: October 15, 1994  
4

  
\_\_\_\_\_  
Michael Walton

1 PROOF OF SERVICE BY MAIL

2 STATE OF CALIFORNIA, COUNTY OF MARIN

3 I am a resident of the county aforesaid; I am over the  
4 age of eighteen years and not a party to the within entitled  
5 action; my business address is 700 Larkspur Landing Circle, Suite  
6 120, Larkspur, California 94939.

7 On October 17, 1994, I served the within MICHAEL WALTON'S  
8 RESPONSE TO PLAINTIFF'S DEMAND FOR INSPECTION OF REAL PROPERTY on  
9 the interested parties by placing true copies thereof enclosed in  
10 sealed envelopes with postage thereon fully prepaid, in the United  
11 States mail at Larkspur, California addressed as follows:

12 Laurie J. Bartilson  
13 Bowles & Moxon  
14 62 55 Sunset Blvd., Suite 2000  
15 Los Angeles, CA 90028

16 Andrew Wilson  
17 Wilson, Ryan & Campilongo  
18 235 Montgomery Street, Suite 450  
19 San Francisco, CA 94104

20 Ford Greene, Esq.  
21 711 Sir Francis Drake  
22 San Anselmo, CA 94960

23 Executed on October 17, 1994 at Larkspur, California.

24 I declare under penalty of perjury that the foregoing is  
25 true and correct.  
26  
27

---

**EXHIBIT G**



1 Andrew H. Wilson, SBN #063209  
2 WILSON, RYAN & CAMPILONGO  
3 235 Montgomery Street  
4 Suite 450  
5 San Francisco, California 94104  
6 (415) 391-3900  
7 Telefax: (415) 954-0938

8 Laurie J. Bartilson, SBN #139220  
9 BOWLES & MOXON  
10 6255 Sunset Boulevard, Suite 2000  
11 Hollywood, CA 90028  
12 (213) 463-4395  
13 Telefax: (213) 953-3351

14 Attorneys for Plaintiff and  
15 Cross-Defendant CHURCH OF SCIENTOLOGY  
16 INTERNATIONAL

17 SUPERIOR COURT OF THE STATE OF CALIFORNIA

18 FOR THE COUNTY OF MARIN

19 CHURCH OF SCIENTOLOGY ) CASE NO. 157 680  
20 INTERNATIONAL, a California not- )  
21 for-profit religious corporation; ) NOTICE OF TAKING OF  
22 ) DEPOSITION OF DEFENDANT  
23 Plaintiffs, ) SOLINA WALTON  
24 )  
25 vs. )  
26 )  
27 GERALD ARMSTRONG; MICHAEL WALTON; )  
28 et al., )  
29 Defendants. )  
30 ) TRIAL DATE: May 18, 1995  
31 )  
32 \_\_\_\_\_ )

33 TO ALL PARTIES OF RECORD AND THEIR COUNSEL:

34 PLEASE TAKE NOTICE that plaintiff, Church of Scientology  
35 International, will take the deposition of defendant Solina  
36 Walton on Tuesday, November 15, 1994 at 10:00 a.m. at the law  
37 offices of Wilson, Ryan & Campilongo, 235 Montgomery Street,  
38 Suite 450, San Francisco, California 94104. This deposition will  
39 be taken before a certified shorthand reporter and Notary Public,

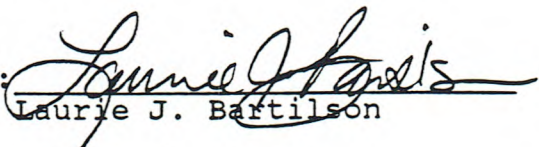
1 or other such person authorized to administer oaths who may be  
2 present at such time and place. The deposition shall continue  
3 from day to day, excluding weekends and holidays, until  
4 completed. Pursuant to Section 2025(1) of the Code of Civil  
5 Procedure, plaintiff hereby gives notice of its intent to  
6 videotape said deposition.

7 Dated: October 3, 1994

Respectfully submitted,

BOWLES & MOXON

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BY:   
Laurie J. Bartilson

Andrew H. Wilson  
WILSON, RYAN, & CAMPILONGO

Attorneys for Cross-  
Defendant  
CHURCH OF SCIENTOLOGY  
INTERNATIONAL

PROOF OF SERVICE

STATE OF CALIFORNIA            )  
  )    ss.  
COUNTY OF LOS ANGELES        )

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On October 4, 1994, I served the foregoing document described as NOTICE OF TAKING OF DEPOSITION OF DEFENDANT SOLINA WALTON on interested parties in this action,

by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

by placing  the original  true copies thereof in sealed envelopes addressed as follows:

FORD GREENE  
HUB Law Offices  
711 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

MICHAEL WALTON  
700 Larkspur Landing Circle  
Suite 120  
Larkspur, CA 94939

SOLINA WALTON  
707 Fawn Drive  
San Anselmo, CA 94960-1160

BY MAIL

\*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on October 4, 1994, at Los Angeles, California.

**\*\* (BY PERSONAL SERVICE)** I delivered such envelopes by hand to the offices of the addressees.

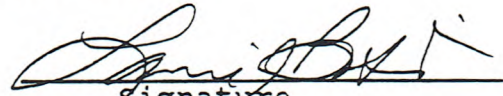
**\*\*** Such envelopes were hand delivered by Messenger Service

Executed on \_\_\_\_\_, at Los Angeles, California.

(State) I declare under penalty of the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Laure Barritson  
Print or Type Name

  
Signature

\* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

\*\* (For personal service signature must be that of messenger)

**EXHIBIT H**

**BOWLES & MOXON**  
ATTORNEYS AT LAW  
6255 SUNSET BOULEVARD  
SUITE 2000  
HOLLYWOOD, CALIFORNIA 90028

TIMOTHY BOWLES \*  
KENDRICK L. MOXON #  
LAURIE J. BARTILSON †  
HELENA K. KOBRIN ‡

(213) 463-4395  
TELECOPIER (213) 953-3351

\* ALSO ADMITTED IN OREGON  
# ALSO ADMITTED IN THE DISTRICT OF  
COLUMBIA  
† ALSO ADMITTED IN MASSACHUSETTS  
‡ ALSO ADMITTED IN FLORIDA

November 17, 1994

**BY TELEFAX AND U.S. MAIL**

Michael Walton, Esq  
700 Larkspur Landing Circle  
Suite 120  
Larkspur, CA 94939

P.O. Box 751  
San Anselmo, CA 94979

Re: Church of Scientology International v. Gerald Armstrong et al., Marin County No. 157 680

Dear Mr. Walton:

I am writing concerning plaintiff's demand to inspect the real property which is the primary subject of this lawsuit; that is, the house on Fawn Drive which Gerald Armstrong conveyed to you in August, 1990, and to which your wife now claims title. The demand was served on you and your wife, in a timely fashion, on October 27, 1994. In response, I have received an objection from you alone, which objects that the requested inspection violates your privacy, is irrelevant, burdensome, oppressive, "harassive," and not calculated to lead to the discovery of admissible evidence. You additionally recite C.C.P. § 2024(a) as grounds for your objection. I write this letter in the hope that we may resolve our differences and allow the requested discovery without a need for a motion to compel.

Mr. Walton, as you well know, the house and its value are central issues in this case. Plaintiff seeks this inspection in order to have the house appraised by a professional real estate appraiser. Such a request is hardly "irrelevant." In an action in which the main issues concern the fraudulent conveyance of cash and real property from Mr. Armstrong to you, it is both relevant and likely to lead to the discovery of relevant evidence. Nor would the requested inspection invade your "privacy;" I am certain that between us we can agree upon conditions that will allow the appraiser to complete his inspection in the least intrusive manner possible.

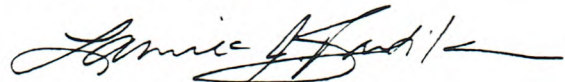
Ford Greene  
November 17, 1994  
Page 2

While relying for your objection here on C.C.P. § 2024(a), you have simultaneously filed a demurrer to the complaint against your wife in which you complain that she is prejudiced because she may not obtain further discovery. I propose that we solve both problems by stipulating to an extension of the discovery cut-off until thirty days before the presently-scheduled trial date, pursuant to C.C.P. § 2024(f). It seems that both of us consider that good cause exists for such an extension.

Please advise me promptly whether you will agree to an extension of the discovery cut-off, and whether you will permit an inspection of the Fawn Drive property. In the event that you are unwilling to extend the discovery cut-off so that plaintiff can inspect the property, I will be forced to file a motion for an extension pursuant to C.C.P. §2024(e). Your attention is directed to §2024(e)(4).

Sincerely,

BOWLES & MOXON



Laurie J. Bartilson

LJB:mfh  
cc: Andrew H. Wilson, Esq.  
Michael Lee Hertzberg, Esq.  
Ford Greene, Esq.  
Paul Morantz, Esq.





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(213) 463-4395  
TELECOPIER (213) 953-3351

\* ALSO ADMITTED IN OREGON  
# ALSO ADMITTED IN THE DISTRICT OF  
COLUMBIA  
† ALSO ADMITTED IN MASSACHUSETTS  
‡ ALSO ADMITTED IN FLORIDA

November 22, 1994

**BY TELEFAX AND U.S. MAIL**

Michael Walton, Esq  
700 Larkspur Landing Circle  
Suite 120  
Larkspur, CA 94939

P.O. Box 751  
San Anselmo, CA 94979

Re: Church of Scientology International v. Gerald Armstrong et al., Marin County No. 157 680

Dear Mr. Walton:

I have received no response to my letter or phone calls of the past week concerning the above-entitled case. As you know, I am attempting to resolve the dispute which has arisen concerning the inspection of the property and deposition of your client, Solina Walton.

You have claimed (by way of demurrer) that Ms. Walton is prejudiced because she has not been able to conduct discovery in the proceedings and discovery is now closed. Kindly identify the discovery which you believe Ms. Walton needs to take. If her requests are reasonable, and not duplicative of earlier discovery which you yourself have taken, plaintiff will of course be willing to stipulate that she may take the desired discovery.

This is the second time that I have requested this information from you. Your failure to respond is indicative that you have advanced an argument to the court that has no basis in good faith -- i.e., you are unable to identify a single discovery action which Solina allegedly must take in this action.

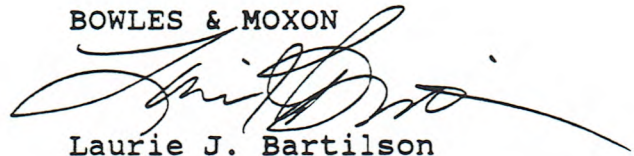
In addition, I have proposed a reasonable stipulation which would allow plaintiff to complete relevant and necessary discovery as well. You have not responded at all to my request.

Michael Walton, Esq.  
November 22, 1994  
Page 2

Please be advised that I will seek costs and sanctions if I am forced to bring a motion to resolve this discovery dispute because of your refusal to discuss these matters with me in good faith.

Sincerely,

BOWLES & MOXON

A handwritten signature in cursive script, appearing to read "Laurie J. Bartilson", written in black ink. The signature is fluid and extends across the width of the text block.

Laurie J. Bartilson

LJB:mfh

cc: Andrew H. Wilson, Esq.  
Michael Lee Hertzberg, Esq.  
Ford Greene, Esq.  
Paul Morantz, Esq.

PROOF OF SERVICE

STATE OF CALIFORNIA            )  
  )    ss.  
COUNTY OF LOS ANGELES        )

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On November 23, 1994, I served the foregoing document described as DECLARATION OF LAURIE J. BARTILSON IN SUPPORT OF PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR LEAVE TO COMPLETE DISCOVERY; REQUEST FOR SANCTIONS FROM MICHAEL AND SOLINA WALTON on interested parties in this action,

[ ] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [ ] the original [X] true copies thereof in sealed envelopes addressed as follows:

FORD GREENE  
HUB Law Offices  
711 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

MICHAEL WALTON  
700 Larkspur Landing Circle  
Suite 120  
Larkspur, CA 94939

MICHAEL WALTON  
P.O. Box 751  
San Anselmo, CA 94979

PAUL MORANTZ  
P.O. Box 511  
Pacific Palisades, CA 90272

[X] BY MAIL

[ ] \*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[X] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of

business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on November 23, 1994, at Los Angeles, California.

[ ] **\*\* (BY PERSONAL SERVICE)** I delivered such envelopes by hand to the offices of the addressees.

[ ] **\*\*** Such envelopes were hand delivered by Messenger Service

Executed on \_\_\_\_\_, at Los Angeles, California.

[X] (State) I declare under penalty of the laws of the State of California that the above is true and correct.

[ ] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Matt Ward  
Print or Type Name

  
Signature

\* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

\*\* (For personal service signature must be that of messenger)